

## **EXHIBIT B**

Nicholas Barone  
November 18, 2024

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

- - -

NICHOLAS BARONE, : CIVIL ACTION

Plaintiff,

:

vs.

:

TRACEY L. GORDON,

Individually, and :

CITY OF PHILADELPHIA

Defendant. : NO. 2:23-CV-02821

- - -

Philadelphia, Pennsylvania

November 18, 2024

- - -

Deposition of NICHOLAS BARONE,  
held in the offices of MARSHALL DENNEHEY  
WARNER COLEMAN & GOGGIN on the above date at  
10:00 a.m., before Kimberly Cateon,  
Professional Shorthand Reporter and Notary  
Public.

U.S. LEGAL SUPPORT  
1818 Market Street, Suite 1400  
Philadelphia, Pennsylvania 19103  
(877) 479-2484

Nicholas Barone  
November 18, 2024

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## I N D E X

- - -

Testimony of: NICHOLAS BARONE

By Mr. Gonzales 5, 96

By Mr. Savage 93

- - -

## E X H I B I T S

- - -

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Direction To Witness Not To Answer  
(None)

Request For Production Of Documents  
(None)

Stipulations  
Page 5, Line 6

Questions Marked  
(None)

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- - -

NICHOLAS BARONE, after  
having been first duly sworn, was  
examined and testified as follows:

- - -

MR. SAVAGE: Before we  
begin, I just want to reserve the right  
to read and sign. Thank you.

EXAMINATION

By MR. GONZALES:

Q. Mr. Barone, my name is John  
Gonzales. I represent the defendants in a  
lawsuit that you filed against them. And  
we're here today to ask you questions under  
oath regarding any information that you  
might have that would be relevant to your  
case.

A. Okay.

Q. Before I start asking questions,  
however, I have a couple of instructions  
for you. The first is to give a verbal  
response to my questions. There is a court  
reporter who is seated to your left. She's  
taking down my questions and your answers.  
But she can't take down nods of the head or

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1 "uh-huhs" or "uh-uhs. All right.

2 Do you understand that  
3 instruction?

4 A. Yes.

5 Q. All right. Second instruction is  
6 if you could wait until I finish asking a  
7 question before you give an answer, it  
8 makes it a lot easier on the court reporter  
9 if only one of us is talking at once.

10 Do you understand that  
11 instruction?

12 A. Yes.

13 Q. And the third instruction is if  
14 you don't hear or understand a question  
15 that I ask, just ask me to rephrase it,  
16 because if you answer it I will assume that  
17 you heard it and that you understood it.

18 Do you understand that  
19 instruction?

20 A. Yes.

21 Q. Is there any reason why you would  
22 not be able to testify truthfully today?

23 A. No.

24 Q. Have you consumed any alcohol or  
25 medication in the last 12 hours?

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1 A. No.

2 Q. Can you state your full name,  
3 please?

4 A. Nicholas Charles Frances Barone.

5 Q. And Mr. Barone, where do you  
6 live?

7 A. 1815 West Moyamensing Avenue.

8 Q. Do you live there with anyone?

9 A. Yes, it's my parents' house.

10 Q. And do you live with your  
11 parents?

12 A. Yes.

13 Q. And what are your parents' names?

14 A. Eileen and Nicholas. Do you need  
15 full names or...

16 Q. Yeah, that's fine. Their last  
17 name, I assume, is Barone?

18 A. Barone, yes.

19 Q. Does anyone else live there?

20 A. Yes, my three brothers as well.

21 Q. And what are their names?

22 A. Joseph, Matthew, Christopher.

23 Q. Are you Catholic by any chance?

24 MR. GONZALES: Off the  
25 record.

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1 (A discussion was held off  
2 the record.

3 MR. GONZALES: Back on the  
4 record.

5 BY MR. GONZALES:

6 Q. All right. Who is the oldest?

7 A. Me.

8 Q. And what is your date of birth?

9 A. 10/13/94.

10 Q. How old is Joseph?

11 A. He's my twin, so we're both 30.

12 Q. Got it. Matthew?

13 A. 20 -- he'll be -- he's 28.

14 Q. And Christopher?

15 A. 23.

16 Q. Are you married?

17 A. No.

18 Q. Ever been married?

19 A. No.

20 Q. Have any kids?

21 A. No.

22 Q. Ever been arrested?

23 A. No.

24 Q. Ever served in the military?

25 A. No.

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1 Q. Where did you go to high school?

2 A. Saint John Neumann Goretti.

3 Q. What year did you graduate?

4 A. 2013.

5 Q. Any college after that?

6 A. No.

7 Q. What do your parents do for a  
8 living?

9 A. My mother is a nurse. And my  
10 father works for a law firm.

11 Q. What does he do?

12 A. They work on foreclosing houses.  
13 I think it's the sheriff's department. I'm  
14 not -- I'm not too positive, to be honest.

15 Q. Okay. He doesn't work for the  
16 city, though; is that correct?

17 A. No.

18 Q. Where does your mom work as a  
19 nurse?

20 A. She's an administrator now. She  
21 works at the Jefferson Surgical Center in  
22 Cherry Hill.

23 Q. What does Joseph do for a living?

24 A. He works for the facilities team  
25 for a company called New Health.

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1 Q. Do you work for New Health?

2 A. Yes.

3 Q. What does Matthew do?

4 A. He works at my cousin's pizza  
5 place in Media.

6 Q. What is the name of the pizza  
7 place?

8 A. Poseidon.

9 Q. Where in Media is it, do you  
10 know? Like in the borough there or --

11 A. I think so, I'm not too positive.

12 Q. And how about Christopher? What  
13 does he do?

14 A. Nothing.

15 Q. Nothing?

16 MR. GONZALES: Off the  
17 record.

18 (A discussion was held off  
19 the record.)

20 MR. GONZALES: Back on the  
21 record.

22 BY MR. GONZALES:

23 Q. So you graduated from Saint John  
24 Neumann Goretti in 2013. You said no  
25 college, but have you taken any classes

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1 for, like, certifications, or to get a  
2 license?

3 A. I attempted to go to CCP. I went  
4 to IUP. Both -- dropped out of both,  
5 though.

6 Q. All right. When did you go to  
7 CCP? And that's community college,  
8 correct?

9 A. Immediately after. Only went for  
10 a few months.

11 Q. All right. Like in the fall of  
12 2013 or in the summer?

13 A. I don't remember.

14 Q. All right. Did you have, like, a  
15 course of study that you were pursuing?

16 A. No.

17 Q. All right. And why did you drop  
18 out?

19 A. It just wasn't for me.

20 Q. And then you said you went to  
21 IUP?

22 A. Yeah.

23 Q. That's Indiana University of  
24 Pennsylvania?

25 A. Yes.



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1 Q. When did you go there?

2 A. 2016.

3 Q. All right. Did you take any  
4 classes there?

5 A. I went to about a month worth of  
6 classes.

7 Q. And then what happened?

8 A. I dropped out.

9 Q. Why?

10 A. It wasn't for me.

11 Q. Okay. What were you going to  
12 study at IUP? Did you have a major?

13 A. Started nursing, went to finance,  
14 left.

15 Q. Nursing, finance?

16 A. Yes.

17 Q. Okay. Any interest in pursuing a  
18 nursing degree non -- like  
19 non-baccalaureate?

20 A. No.

21 Q. All right. Where do you  
22 currently work?

23 A. I work at the Jefferson Surgical  
24 Center in Cherry Hill.

25 Q. And what do you do for them?

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1 A. I'm the assistant materials  
2 manager.

3 Q. And what do you do?

4 A. We pretty much order, hold, take  
5 care of all supplies, implants, tools,  
6 pretty much anything you can think of, it  
7 goes through us first.

8 Q. Who is the manager?

9 A. Her name is Deanna Conlow.

10 Q. Can you spell the last name?

11 A. C-O-N-L-O-W.

12 Q. Is she your direct supervisor?

13 A. No.

14 Q. Who is your direct supervisor?

15 A. Diana Montello.

16 Q. What's her position?

17 A. She's the DON, director of  
18 nursing.

19 Q. Okay. When did you start at the  
20 Jefferson Surgical Center in Cherry Hill?

21 A. March 11.

22 Q. Of '24?

23 A. Yes.

24 Q. Is that full-time, part-time?

25 A. Full-time.

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1 Q. And what are you making there?

2 A. \$26 an hour.

3 Q. Do you get any overtime?

4 A. No.

5 Q. Are you eligible for any medical  
6 benefits?

7 A. Yes.

8 Q. And are you receiving them now,  
9 or?

10 A. Yes.

11 Q. Okay. They have like a 401(k)?

12 A. Yes.

13 Q. It's probably called something  
14 different, right?

15 A. I believe it is just a 401(k),  
16 yes.

17 Q. Oh, that's what they call it?

18 A. Yes.

19 Q. Do they match -- do they put a  
20 certain amount in for whatever you put in?

21 A. I believe so.

22 Q. Do you have any co-workers?

23 A. Yes.

24 Q. I'm just getting an idea. How  
25 many people in the department?

1 A. In the department specifically?

2 Q. Yes.

3 A. There's just two of us.

4 Q. Before you worked at the  
5 Jefferson Surgical Center, where did you  
6 work?

7 A. I worked for the Penn Auto Team  
8 in the Navy Yard.

9 Q. And what did you do for them?

10 A. I was an auto processor.

11 Q. And what did you do as an auto  
12 processor?

13 A. We would drive the new cars  
14 coming off the ships and process them to go  
15 out to dealerships and car shows, et  
16 cetera.

17 Q. What was the coolest car that you  
18 drove off a ship?

19 A. Probably the Genesis. I think it  
20 was the 90.

21 Q. The sedan? The big sedan or the  
22 SUV?

23 A. The SUV.

24 Q. Like a spaceship.

25 A. I was just going to say that,

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1 yes.

2 Q. When did you start at Penn Auto  
3 Team?

4 A. 2022, in June.

5 Q. Was that full-time or part-time?

6 A. Part-time for four months.

7 Q. So from June until, like, the end  
8 of the summer it was part-time?

9 A. About middle of October.

10 Q. And then middle of October, was  
11 it full-time?

12 A. Correct.

13 Q. And when did you leave Penn Auto  
14 Team?

15 A. Two weeks before I started at the  
16 surgical center.

17 Q. Had you found the job at the  
18 surgical center before you left Penn?

19 A. Yes.

20 Q. And were you -- did you  
21 voluntarily leave Penn?

22 A. Yes.

23 Q. You weren't terminated?

24 A. I resigned. No, I resigned.

25 Yes.

1 Q. And when you were at Penn Auto,  
2 when you first started working part-time in  
3 June of '22, what were you earning?

4 A. \$15 an hour.

5 Q. Any benefits?

6 A. No.

7 Q. And about how many hours a week  
8 were you working when you were doing  
9 part-time?

10 A. It was 40 hours.

11 Q. 40 hours for part-time?

12 A. Yes.

13 Q. And then you said you switched to  
14 full-time sometime in October?

15 A. Mid-October, yes.

16 Q. And what were you earning when  
17 you were full-time?

18 A. 19.70.

19 Q. And that's per hour?

20 A. Yes.

21 Q. And how many hours a week were  
22 you working?

23 A. 40 hours.

24 Q. Did you ever get overtime for  
25 them?

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1 A. It was there to take.

2 Q. Right. But did you ever --

3 A. No.

4 Q. -- take it?

5 A. No.

6 Q. So you could have taken more  
7 hours and earned overtime, but you chose  
8 not to?

9 A. Yes.

10 Q. Okay. Any reason why you didn't?

11 A. No.

12 Q. And once you became full-time,  
13 were you -- did you receive any benefits?

14 A. Yes.

15 Q. What type of benefits did they  
16 have? Medical?

17 A. Yes.

18 Q. Did they have any, like, 401(k)?

19 A. No.

20 Q. Okay. Did you get a raise at all  
21 before you left?

22 A. Yes.

23 Q. Do you remember when you got the  
24 raise?

25 A. No.

1 Q. So, when you left to go to  
2 Jefferson, you were making more than 19.70  
3 an hour? Is that right?

4 A. \$20.

5 Q. \$20?

6 A. Correct.

7 Q. Okay. You just don't recall when  
8 that was?

9 A. No.

10 Q. Okay. And why did you leave Penn  
11 Auto to go to the Jefferson Surgical  
12 Center?

13 A. Better opportunity.

14 Q. How did you get the job at Penn  
15 Auto Team?

16 A. Just applied.

17 Q. It wasn't like -- you knew  
18 somebody or anything like that?

19 A. No.

20 Q. Okay. Other than this lawsuit,  
21 have you filed any other lawsuits in your  
22 life?

23 A. No.

24 Q. Has anyone sued you?

25 A. No.



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1 Q. Have you ever filed a workers'  
2 compensation claim?

3 A. No.

4 Q. Did you ever file for  
5 unemployment?

6 A. Yes.

7 Q. How many times?

8 A. Just the once.

9 Q. And that's when you left the  
10 city?

11 A. Yes.

12 Q. Did you get it?

13 A. No.

14 Q. Do you know why you didn't get  
15 it?

16 A. I do not.

17 Q. Was it contested, to your  
18 knowledge?

19 A. I don't remember.

20 Q. Are you currently treating with  
21 any mental health providers? Psychologist,  
22 psychiatrist, therapist, anything like  
23 that?

24 A. No.

25 Q. Have you ever treated with a

1 mental health provider?

2 A. No.

3 Q. When did you join the City of  
4 Philadelphia Register of Wills office?

5 A. January 3rd, 2019.

6 Q. And who was the register of wills  
7 at that time?

8 Well, let's put it this  
9 way. It wasn't Tracey Gordon, right?

10 A. No, it was not.

11 Q. Was it Sabatino, Sabatina, does  
12 that sound about right?

13 A. No.

14 Q. No? Oh no, that's the current  
15 guy.

16 A. Ron -- Ron.

17 Q. Donatucci?

18 A. Yes.

19 Q. And how did you hear about the  
20 job at the Register of Wills office?

21 A. My neighbor Lou.

22 Q. And who is your neighbor Lou?

23 A. Lou DiRenzo.

24 Q. What does he do?

25 A. I believe he runs the probate

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1 office.

2 Q. For the city?

3 A. Yes.

4 Q. The probate office in the  
5 register of wills?

6 A. Correct.

7 Q. Okay. All right. So what did he  
8 tell you? What did he say about the job?

9 A. He just said they had an  
10 opportunity, an opening. And I didn't have  
11 anything at the time because I just dropped  
12 out of school, so I took him up on it.

13 Q. Walk me through what you were  
14 doing after you graduated high school up  
15 until you got the job in the register of  
16 wills. So you graduated, like, June of  
17 2013?

18 A. Yes.

19 Q. All right. What did you do that  
20 summer?

21 A. I did nothing that summer. I  
22 started working in my cousin's restaurant  
23 part-time, just a couple days a week.

24 Q. The --

25 A. Brick.

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1 Q. Oh, Brick?

2 A. No, no. Yes, Brick.

3 Q. Where is Brick?

4 A. It was on 17th and Lombard.

5 Q. All right. Do you remember when  
6 you started working there?

7 A. About August.

8 Q. And what were you doing there?

9 A. Just little things, food running,  
10 dishes, you know. Because I attempted to  
11 go to CCP at that time as well. So I was  
12 just trying to make a little extra cash.

13 Q. Yeah, I understand. All right.  
14 And how long did you work at Brick?

15 A. A few years, up until it closed.

16 Q. Just putting this together,  
17 sounds like you said that you started at  
18 CCP, at that -- whatever that semester was  
19 --

20 A. Correct.

21 Q. -- but it was what, about a --  
22 you say a month? Few weeks?

23 A. About a month, couple months.

24 Q. Okay. All right. So sometime in  
25 that fall of 2013 you were going to CCP,

Nicholas Barone  
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1 but then you stopped.

2 A. Correct.

3 Q. But you continued to work at your  
4 cousin's restaurant at Brick?

5 A. Yes.

6 Q. Were you working full-time?

7 A. No. I eventually started  
8 full-time.

9 Q. Okay. Were you on the books?

10 A. No.

11 Q. Okay. And you said you worked  
12 there for a few years, you said?

13 A. Yes.

14 Q. Until it closed?

15 A. Yes.

16 Q. Again, which was about when, if  
17 you can recall?

18 A. I don't recall.

19 Q. All right. So 2013. Did you  
20 work there 2014, the following year?

21 A. Yes.

22 Q. How about 2015?

23 A. Yes. Because then I went to IUP.

24 Q. Right. Okay. Do you remember  
25 how much you were making there?

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1 A. I don't. I don't remember.

2 Q. All right. So then you go to  
3 IUP. You went out there?

4 A. Yes.

5 Q. Okay. So you went to move on  
6 campus?

7 A. Yes.

8 Q. All right. And I take it you  
9 weren't working while you were at IUP?

10 A. No.

11 Q. And then when did you come home  
12 from IUP?

13 A. 2017. 2018.

14 Q. Okay.

15 A. Around then.

16 Q. All right. So the years are  
17 correct. So you stopped working at Brick  
18 around 2015, 2016?

19 A. 2016, yes.

20 Q. All right. And then you would  
21 have gone to IUP -- I think you said  
22 sometime, like, 2016, the fall? Does that  
23 sound right?

24 A. Yes.

25 Q. And then you returned. And then

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1 what did you do when you got back from IUP?

2 A. I applied to jobs and then was  
3 presented with the opportunity for the  
4 register of wills.

5 Q. So, between 2017 and 2019, did  
6 you work anywhere?

7 A. No.

8 Q. I thought I saw a W-2 that your  
9 attorney produced from 2018, from some  
10 surgical -- Riverview Surgical Center.

11 A. Yeah, in the Navy Yard. I worked  
12 there for about a month.

13 Q. Okay.

14 A. A couple months as a  
15 perioperative assistant. It didn't work  
16 out.

17 Q. Okay. But that's where it was,  
18 was down at the Navy Yard?

19 A. Correct.

20 Q. What's a periop -- what is that?

21 A. Basically just clean the rooms  
22 after surgeries.

23 Q. They do surgeries down at the  
24 Navy Yard?

25 A. Yes. There's Jefferson Surgical

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1 Center down there as well.

2 Q. All right. Your W-2 said you  
3 made, like, 185 bucks or something, is that  
4 right, or did you make more?

5 A. I don't remember.

6 Q. Okay. Was that full-time or  
7 part-time?

8 A. Part-time.

9 Q. All right. And then you got the  
10 job at the register of wills, correct?

11 A. Correct.

12 Q. When you started at the register  
13 of wills, was it a full-time or a part-time  
14 job?

15 A. It was presented to me as a  
16 part-time position, but I would be doing  
17 full-time hours.

18 Q. When you say it was presented to  
19 you, who presented it to you?

20 A. The HR.

21 Q. Who did you meet with in HR?

22 A. I remember her name was Virginia.

23 Q. So your neighbor tells you about  
24 this job at the register of wills, right?

25 A. Yes.



1 Q. After he tells you about the job,  
2 what did you about it?

3 A. I applied for it.

4 Q. Was there, like, a formal  
5 application you had to submit, or what did  
6 you do?

7 A. I don't remember.

8 Q. Did you call somebody or e-mail  
9 somebody or send a letter, if you remember?

10 A. I can't recall.

11 Q. Did you have an interview with  
12 anyone before you were hired?

13 A. Yes, with Virginia.

14 Q. Okay. But just with Virginia?  
15 You didn't have an interview with anyone  
16 else within the register of wills?

17 A. No.

18 Q. When you interviewed with  
19 Virginia, did you already have the job,  
20 basically? Or were you interviewing to get  
21 the job?

22 A. Interviewing to get the job.

23 Q. Okay. Do you understand my  
24 question?

25 A. Yes, yes.

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1 Q. All right. So this is not like,  
2 hey, we got a job for, you know, Nick  
3 Barone. Just come on in and...

4 A. No. It wasn't like that.

5 Q. Okay. Do you know how many other  
6 individuals applied for the job?

7 A. I'm not sure.

8 Q. All right. So, when you met with  
9 Virginia, tell me -- first of all, when did  
10 that meeting take place?

11 A. I can't recall.

12 Q. Was it in 2018?

13 A. It was right before the New Year,  
14 so, yes.

15 Q. And the paperwork says you  
16 started in January of 2019.

17 A. January 3rd, yes.

18 Q. Okay. So, sometime in December  
19 of 2018?

20 A. Yes.

21 Q. And when you met with Virginia,  
22 tell me what you recall from the meeting.

23 A. I don't recall anything.

24 Q. Nothing?

25 A. No.

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1 Q. Did she say what the job was?

2 A. Yes. It was picking files and  
3 running files up sometimes to City Hall.

4 Q. Okay. Did she say -- and you  
5 said that she told you it was going to be  
6 40 hours, but you would be a part-time  
7 employee?

8 A. It was 35 hours.

9 Q. Okay. Did she say whether there  
10 would be any benefits involved?

11 A. No.

12 Q. Okay. Did you ask?

13 A. No.

14 Q. And was anyone else present for  
15 the meeting?

16 A. No.

17 Q. I take it that you were hired?

18 A. Yes.

19 Q. Obviously. Do you remember when  
20 you were notified that you were hired?

21 A. About a week after.

22 Q. How were you notified?

23 A. She called me.

24 Q. All right. And do you remember  
25 what she said?

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1 A. No.

2 Q. After you were hired, you said  
3 you were -- your first day was January 3rd  
4 of 2019?

5 A. Yes.

6 Q. Where did you go, physically?

7 A. 5th and Spring Garden. There's  
8 an archives down there.

9 Q. How did you know to go there?

10 A. That's where she told me to go.

11 Q. All right. So you go there, tell  
12 me what happened the first day. Did you  
13 meet with anybody?

14 A. I met Bob Brown.

15 Q. Bob who?

16 A. Bob Brown.

17 Q. Who is Mr. Brown?

18 A. He was the supervisor at the  
19 time.

20 Q. Supervisor of the archives?

21 A. Of the archives, yes.

22 Q. Tell me about that meeting. Was  
23 anyone else present for the meeting?

24 A. No. He just met me outside, and  
25 then we just went in and started working.

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1 Q. Okay. So it was not like a  
2 sit-down?

3 A. No.

4 Q. Did he explain what the job was?  
5 Did anybody explain what the job was before  
6 you accepted it?

7 A. He did. Bits and pieces. It was  
8 more of a just learn-as-you-go type thing.

9 Q. All right. So when you started,  
10 how many other employees were working down  
11 at the archives, if you recall?

12 A. There was four of us total when I  
13 first started.

14 Q. Who were they?

15 A. Keith Perry and Robert Solvibile.  
16 I don't know how to spell his last name.

17 Q. So I got Keith, I got Rob, any  
18 other employees?

19 A. Bob Brown.

20 Q. And Bob Brown.

21 A. Yes. And myself.

22 Q. Right. Supervisor, got it.

23 Were Keith and Robert --  
24 what was their job?

25 A. They were also there to pick

1 files, et cetera.

2 Q. Basically same as you?

3 A. Pretty much.

4 Q. Were the other employees  
5 full-time or part-time?

6 A. They were both full-time.

7 Q. I take it Bob was a full-time  
8 employee?

9 A. Yes.

10 Q. When you first started in 2019, I  
11 take it you were an hourly employee,  
12 correct?

13 A. Yes.

14 Q. How did you keep track? Or do  
15 you know how the --

16 A. They had a timesheet.

17 Q. We have to ask the question  
18 first.

19 A. I'm sorry.

20 Q. It's all right.

21 Do you know how the City  
22 or the Register kept track of your time  
23 when you first started in 2019?

24 A. We had a timesheet that we would  
25 sign.

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1 Q. And what were your hours when you  
2 started?

3 A. 9 to 5, I believe.

4 Q. 9 a.m. to 5 p.m.?

5 A. Yes.

6 Q. Was that the hours of the other  
7 employees as well?

8 A. I'm not sure.

9 Q. All right. Did you work five  
10 days a week?

11 A. Yes.

12 Q. Monday through Friday?

13 A. Yes.

14 Q. So, when you would come into  
15 work. You would sign the timesheet?

16 A. Yes.

17 Q. And when you would leave, you  
18 would sign the timesheet?

19 A. Yes.

20 Q. How about lunch? Did you get  
21 lunches? Lunch time, I should say.

22 A. Yes.

23 Q. And were you supposed to sign out  
24 at lunch?

25 A. Yes.

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1 Q. At any point in time during your  
2 employment with the register of wills, the  
3 way they kept track of your time, did it  
4 change?

5 A. No.

6 Q. So they always used a timesheet,  
7 to your knowledge?

8 A. Yes.

9 Q. So when you first started, you  
10 were working with these other employees,  
11 basically pulling files --

12 A. Yes.

13 Q. -- to be sent up to City Hall?

14 A. Yes. Putting them away, pulling  
15 them.

16 Q. How would you get an assignment?  
17 Like how would you know what boxes or files  
18 to pull?

19 A. It would be e-mailed to us.

20 Q. And when you say "to us," was  
21 there, like, a central e-mail that would  
22 receive the order?

23 A. So, it would either go to Bob  
24 Brown or myself.

25 Q. It would not go to Keith or Rob?



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1 A. No.

2 Q. Okay. Was there any reason why?

3 A. Not that I know of.

4 Q. Okay. Who would you get the  
5 e-mails from?

6 A. Wayne Perry.

7 Q. What was Mr. Perry's job?

8 A. I'm not too sure.

9 Q. All you knew was Wayne would  
10 e-mail you from City Hall, tell what you  
11 files to pull and bring to City Hall?

12 A. Yes.

13 Q. And was there a system in place  
14 as far as when files would be delivered to  
15 City Hall, or was it just as needed? When  
16 you first started?

17 A. It would differ.

18 Q. Okay.

19 A. It would either be -- sometimes  
20 it would be as needed, sometimes at the end  
21 of the day, beginning of the day. It all  
22 depended on what they needed.

23 Q. Okay. Was there, like, a regular  
24 delivery that would take place, you know,  
25 at a set time every day?

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1 A. Yes. About noon-ish.

2 Q. Okay.

3 A. And then sometimes at the end of  
4 the day as well.

5 Q. All right. Who would be  
6 responsible for delivering the files from  
7 the archives to City Hall?

8 A. It all differed.

9 Q. Would it be one of the four  
10 employees down there?

11 A. It was either me or Bob.

12 Q. Okay. Did you use your vehicle?

13 A. Yes.

14 Q. Were you compensated for your  
15 travel time?

16 A. No.

17 Q. All right. And how about to  
18 retrieve files from City Hall and return  
19 them to the archives, was there, like, a  
20 set time that that took place, or was it as  
21 needed?

22 A. It was as needed.

23 Q. So when you went to deliver  
24 files, you'd pick up whatever they had  
25 waiting for you?

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1 A. Correct.

2 Q. At any point in time during 2019,  
3 do you remember, were there any issues or  
4 complaints that you were made aware of  
5 about late deliveries or not getting the  
6 files from archives to City Hall on a  
7 timely basis?

8 A. Absolutely not.

9 Q. Now at some point did your  
10 co-workers change? Did any of the  
11 employees leave? Did new employees come on  
12 board?

13 A. Yes.

14 Q. So let's do it in order. Who was  
15 the first employee to leave?

16 A. Bob Solvibile.

17 Q. All right. Do you remember when  
18 Bob left?

19 A. I do not.

20 Q. Do you remember why he left?

21 A. I do not.

22 Q. Do you know where he went?

23 A. No.

24 Q. Was Bob replaced?

25 A. Yes.

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1 Q. Who replaced Bob?

2 A. Chris Guest.

3 Q. Do you remember when Chris got

4 hired?

5 A. Vaguely.

6 Q. What do you mean, vaguely?

7 A. I just remember him coming in.

8 Q. Do you remember what month?

9 A. No.

10 Q. Was it before Tracey Gordon

11 became the Register of Wills?

12 A. No.

13 Q. Okay. All right. So Bob was the

14 first one to leave, and he was replaced by

15 Christopher Guest -- or Chris Guest.

16 And when was the next

17 person to leave?

18 A. Bob Brown.

19 Q. Do you remember when Bob left?

20 A. No.

21 Q. Do you know why he left?

22 A. No.

23 Q. Was Bob replaced?

24 A. Yes.

25 Q. Who was he replaced by?

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1 A. Pat Parkinson.

2 Q. Did you know Pat from anything  
3 before?

4 A. No.

5 Q. Did you know Chris Guest any time  
6 before?

7 A. No.

8 Q. All right. And then when did  
9 Keith leave?

10 A. Keith didn't. Keith was there --

11 Q. Okay.

12 A. -- the whole time. He was moved  
13 eventually to City Hall.

14 Q. Got it. Did you get along with  
15 Keith when he was working down at archives?

16 A. Yes.

17 Q. Did Keith seem to get along with  
18 everyone else?

19 A. Yes.

20 Q. Do you remember when Keith went  
21 to City Hall?

22 A. I do not.

23 Q. Was it before or after Tracey  
24 Gordon became Register of Wills?

25 A. After.

1 Q. Do you know who replaced Keith?

2 A. Mark Wilson came in. But Keith  
3 was there for Mark Wilson for a little bit.

4 Q. So at one point there was five  
5 employees down there?

6 A. Yes.

7 Q. Because they hired Mark, and  
8 Keith was still there?

9 A. Yes.

10 Q. All right. And then at some  
11 point, Keith went back -- went to City  
12 Hall, right?

13 A. Yes.

14 Q. And did they replace Keith?

15 A. Not that I know of.

16 Q. Okay. So, was there a period of  
17 time where it was you, Chris, Pat, and  
18 Mark?

19 A. For about a month and a half,  
20 maybe.

21 Q. Okay. And then what happened?  
22 Who was the next person?

23 A. Tom Campion was hired as the  
24 supervisor.

25 Q. Did Pat stay down there, or did

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1 he go somewhere else?

2 A. No. He went back to City Hall.

3 Q. Do you remember when Mr. Campion  
4 was hired as the supervisor?

5 A. No.

6 Q. Was he hired when Ms. Gordon was  
7 the register?

8 A. Yes.

9 Q. Did you know Tom before he got  
10 hired?

11 A. No.

12 Q. And at some point did Chris  
13 leave? Chris Guest?

14 A. I was gone by then.

15 Q. Oh, you were? Okay.

16 Mark Wilson, did he leave  
17 before you?

18 A. No.

19 Q. Tom Campion, did he leave before  
20 you?

21 A. No, I was the first to go.

22 Q. Okay. And while Tom Campion was  
23 your supervisor, how would you rate him as  
24 a supervisor?

25 A. He was a great supervisor.

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1 Q. At any point in time, did you  
2 become aware of any issues or concerns that  
3 were raised at City Hall about the  
4 timeliness of delivering archive material  
5 files from the archives to City Hall?

6 A. No.

7 Q. Do you remember anyone coming  
8 from City Hall to meet with folks in  
9 archives to discuss any issues related to  
10 the archives department?

11 A. No.

12 Q. Did Tom Campion ever tell you or  
13 any of the other employees within your  
14 earshot that there were concerns being  
15 raised at City Hall about the timeliness of  
16 archive materials being delivered?

17 A. No.

18 Q. Did Mr. Campion ever complain to  
19 you about the, you know, the lack of  
20 responsiveness from City Hall to the needs  
21 of the archives folks?

22 A. Can you repeat that?

23 Q. No, probably not, but I'll try.

24 Do you remember Mr.  
25 Campion ever discussing with you or the



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1 other employees about complaints being  
2 raised about the way you guys were being  
3 treated by City Hall?

4 A. No.

5 Q. Did Mr. Campion raise any issues  
6 about the lack of having a lift in the  
7 archives, to your knowledge?

8 A. I can't recall.

9 Q. All right. So, tell me about  
10 your -- strike that.

11 When Ms. Gordon took  
12 office in 2020, did your job duties or  
13 responsibilities change?

14 A. They increased.

15 Q. Okay. How did they increase?

16 A. I was doing everything.

17 Q. When you say everything, what  
18 else was there to do?

19 A. Picking up the files, picking the  
20 files, putting the files away. The work  
21 flow flowed through me.

22 Q. All right. Before she took  
23 office, were you picking up files from City  
24 Hall?

25 A. Yes.

1 Q. Before she took office, were you  
2 picking files from the shelves to be  
3 delivered to City Hall?

4 A. Yes.

5 Q. And before she took office were  
6 you replacing files that were being  
7 returned from City Hall back into the  
8 files? Or the shelves?

9 A. No. Rob Solvibile was the one  
10 putting them away.

11 Q. So, your testimony is that when  
12 Ms. Gordon became the register of wills,  
13 you then took on that additional role of  
14 replacing the files?

15 A. Yes. I was the longest person  
16 there, so I had the most knowledge.

17 Q. Okay. Did you help train any of  
18 the employees that were there?

19 A. Yes.

20 Q. How was Mark Wilson as an  
21 employee?

22 A. He was a good employee.

23 Q. Was there a period of time where,  
24 after you were able to train other  
25 employees about where the files go, that

1 they started to sort of pick up the slack,  
2 so to speak?

3 A. I don't recall.

4 Q. Okay. Why would it be that you  
5 would continue to do more work after you  
6 trained the other employees what to do?

7 A. Can you repeat that?

8 Q. Yeah, I'm trying to figure out,  
9 you said that -- well, let me ask the  
10 question: Why was it that after you  
11 trained the other employees what to do that  
12 you were still doing more work?

13 A. I don't recall.

14 Q. Okay. I mean, were they just  
15 slacking off? That's a legal term by the  
16 way.

17 A. Slacking off? Yes.

18 Q. Did you raise those issues or  
19 concerns with your supervisor?

20 A. No.

21 Q. Okay. How would you describe  
22 them? What were they doing that was  
23 slacking off?

24 A. I don't recall.

25 Q. They just weren't doing as much

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1 work as you were doing?

2 A. Yes.

3 Q. They could have done as much work  
4 as you, right?

5 A. Yes.

6 Q. I take it that you were a  
7 conscientious and hard worker, and if they  
8 were as conscientious and hard-working as  
9 you, they would have been doing as much  
10 work as you were doing. Is that fair to  
11 say?

12 A. Yes.

13 Q. But they weren't, were they?

14 A. No.

15 Q. All right. Did your official  
16 duties or responsibilities change when Ms.  
17 Gordon became register of wills?

18 A. No.

19 Q. Did you ever say anything to your  
20 supervisor about the fact that you were  
21 continuing to do more work than your  
22 co-workers, even though they were trained  
23 and capable of doing more?

24 A. No.

25 Q. Why not?

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1           A.     You get in and just get the job  
2 done.

3           Q.     Do you know somebody by the name  
4 Charmaine Collins?

5           A.     Yes.

6           Q.     Do you remember who she was?

7           A.     I believe, the HR.

8           Q.     Yes.

9           A.     Yes.

10          Q.     Under Ms. Gordon?

11          A.     Yes.

12          Q.     All right. Do you remember Ms.  
13 Collins coming down to archives and having  
14 any discussions with any of the folks in  
15 archives?

16          A.     I don't recall.

17          Q.     How about Keith Harris, do you  
18 know who Keith Harris is?

19          A.     Yes.

20          Q.     Do you recall Mr. Harris coming  
21 down to archives and speaking to any of the  
22 archives folks?

23          A.     I don't recall.

24          Q.     Were you there when Mr. Campion  
25 injured himself on the job?

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1 A. I was not.

2 Q. Okay. So tell me about the  
3 process of getting the files when Ms.  
4 Gordon became the register of wills. Did  
5 the process change, i.e. e-mail, lists, and  
6 then you guys would pick them. Did that  
7 change at all?

8 A. No.

9 Q. After Ms. Gordon took office,  
10 within a couple months, COVID hit, right?

11 A. Yes.

12 Q. Did COVID affect the work down at  
13 the archives?

14 A. Yes.

15 Q. Okay. Tell me how it affected  
16 it.

17 A. We were only allowed two people  
18 in at a time, every other day. The work  
19 decreased because of what was going on.  
20 But other than that, no.

21 Q. So, the number of days in the  
22 archives building itself decreased for you;  
23 is that correct? And the other employees?

24 A. Yes.

25 Q. All right. But your pay stayed

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1 the same, correct?

2 A. I believe so.

3 Q. All right. Other than, like,  
4 distancing, right? They were trying --

5 A. Yes.

6 Q. -- to minimize contact with  
7 others, right?

8 A. Yes, we had a small office. A  
9 little bit bigger than this room. So,  
10 cramming five people in there wasn't a good  
11 idea at the time --

12 Q. All right.

13 A. -- I guess.

14 Q. Other than sort of staggering the  
15 work days with the employees, were there  
16 any other changes that occurred during  
17 COVID?

18 A. I don't recall.

19 Q. All right. Were the assignments,  
20 i.e., the file requests I'll call them,  
21 were they still being e-mailed to you and  
22 then the supervisor, whoever that was? Or  
23 were they all going to you?

24 A. They were all going to me.

25 Q. When did that happen, that all of

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1     them got funneled to you?

2           A.     I started there. Eventually  
3     Wayne would e-mail me about seven, eight  
4     months in. And then it was -- it would go  
5     through Bob Brown at first. And then it  
6     started to go through me. And then Bob  
7     left, and then it flowed through me.

8           Q.     So when Pat Parkinson became the  
9     supervisor down there, at that point in  
10    time all of the assignments were going  
11    directly to you; is that correct?

12          A.     Yes, I would also e-mail them to  
13    Pat. I would share -- I would share.

14          Q.     Understood. But when they came  
15    in to archives, they were literally all  
16    coming in to your e-mail?

17          A.     I believe so, yes.

18          Q.     All right. And then you would  
19    share that information with whoever the  
20    supervisor was --

21          A.     Yep.

22          Q.     -- whether it was Pat or Tom?

23          A.     Yes.

24          Q.     Okay. And when Pat Parkinson  
25    became the supervisor, was there any



1 changes in, like, the assignment, i.e., who  
2 would be pulling files or things like that?

3 A. He would break it down for each  
4 person to do a certain thing.

5 Q. Okay. So you would get the list,  
6 and then you'd share that with Parkinson.  
7 Parkinson then would go through the list  
8 and sort of divvy up who would be pulling  
9 what?

10 A. Yes.

11 Q. All right. And then, again,  
12 while Pat Parkinson was the supervisor, who  
13 would be responsible for delivering the  
14 files once they were pulled?

15 A. I delivered them.

16 Q. All right. And that remained --

17 A. Yes.

18 Q. -- throughout your tenure?

19 A. I didn't do it every single day,  
20 but I did it 80 to 90 percent of the time.

21 Q. All right. Did you feel that you  
22 had adequate equipment down in archives to  
23 be able to access the files and pull them?

24 A. Yes.

25 Q. What did you guys have, like step

1 ladders or something?

2 A. We had a couple step ladders and  
3 there was one lift --

4 Q. Okay.

5 A. -- that he we had.

6 Q. All right. Basically the other  
7 co-workers, your responsibilities were  
8 essentially the same, to access the files,  
9 pull them, get them together for delivery?

10 A. Yes.

11 Q. All right. And then when they  
12 were returned, how were they divvied up to  
13 put them back in the files -- into the  
14 boxes or whatever?

15 A. They would come back in boxes,  
16 and we would just -- usually they were put  
17 back yearly, and we would just grab a box  
18 and, you know, put it away until the year  
19 is done and then just keep moving on.

20 Q. Okay. Did you ever speak  
21 personally to Tracey Gordon?

22 A. Once or twice.

23 Q. Okay. Did she ever yell at you?

24 A. No.

25 Q. When was the first time that you

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1 ever met Tracey Gordon?

2 A. I can't recall.

3 Q. Did you ever meet her

4 face-to-face?

5 A. We had a fundraiser lunch that we

6 actually ate in the same room.

7 Q. Did she ever come down to

8 archives while you were there, to your

9 knowledge?

10 A. I can't recall.

11 Q. Other than this fundraiser lunch

12 where you were in the same room, did you

13 ever have any face-to-face contact with

14 her?

15 A. No.

16 Q. Did she ever call you on the

17 phone?

18 A. No.

19 Q. Did you ever call her on the

20 phone?

21 A. No.

22 Q. Did she ever text you?

23 A. No.

24 Q. Did you ever text her?

25 A. No.

1 Q. Did she ever e-mail you?

2 A. No.

3 Q. Did you ever e-mail her?

4 A. No.

5 Q. The fundraiser lunch, where was  
6 that?

7 A. City Hall.

8 Q. And do you know what the  
9 fundraiser was for?

10 A. For her.

11 Q. Where in City Hall was it?

12 A. We picked up our lunches, and  
13 there was a -- like, a conference room  
14 about the size of this room. And we sat  
15 there -- excuse me. And her and Keith  
16 Harris -- excuse me -- sorry -- they walked  
17 in and sat at the table next to us.

18 Q. Did you know that it was a  
19 fundraiser lunch for Ms. Gordon?

20 A. Yes.

21 Q. Do you remember when that took  
22 place?

23 A. I don't remember.

24 Q. Was it, like, within a month or  
25 two of you -- of Ms. Gordon taking office,

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1 or was it later?

2 A. I don't remember.

3 Q. Okay. Do you remember what the  
4 season was?

5 A. Spring-ish.

6 Q. I take it that we were not  
7 socially distancing at that point?

8 A. No.

9 Q. I know things were going back and  
10 forth, but at that point --

11 A. Right.

12 Q. -- there was no...

13 All right. And how did  
14 you get word or notified that there would  
15 be a fundraiser lunch?

16 A. My supervisor.

17 Q. Which was who at the time?

18 A. Tom.

19 Q. What did he say?

20 A. He asked if we wanted to donate  
21 money towards this luncheon.

22 Q. Did he ask all the employees  
23 together in the archives, or just come up  
24 to you individually? How did he --

25 A. All together.

1 Q. Do you remember what time of day  
2 it was?

3 A. I don't remember.

4 Q. Do you remember where you were?

5 A. When he asked?

6 Q. Yes.

7 A. In the archives.

8 Q. Right. But in the office, out in  
9 the --

10 A. I don't remember.

11 Q. All right. So was he talking  
12 about other things when this topic came up,  
13 or was it just this topic?

14 A. I don't recall.

15 Q. So tell me as fully and  
16 completely as you can recall, what he said.

17 A. He asked if we wanted to donate  
18 money, and we would get a lunch out of it.  
19 That's pretty much it.

20 Q. What did you say?

21 A. I had to think about it.

22 Q. All right. What did the other  
23 employees say?

24 A. I don't remember.

25 Q. Do you know who was present, the

1 other employees?

2 A. I don't remember.

3 Q. All right. When you said you had  
4 to think about it, did Mr. Campion say  
5 anything in response?

6 A. No.

7 Q. Did he tell you how much you  
8 would have to donate in order to get a  
9 lunch?

10 A. \$125.

11 Q. All right. Did you ever get back  
12 to him?

13 A. Yes.

14 Q. When?

15 A. I believe the next day.

16 Q. What did you tell him?

17 A. I told him that I would donate.

18 Q. Okay. Did Mr. Campion say  
19 anything else during that initial meeting  
20 where he asked if you wanted to donate the  
21 \$125 for the lunch? Did he say anything  
22 else during that time?

23 A. I don't remember.

24 Q. Did he say whether he agreed with  
25 that or he disagreed with it or...

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1 A. All I remember is it was for her.

2 Q. Okay.

3 A. That's it.

4 Q. You don't remember him saying I  
5 can't believe she's doing this, or this is  
6 really unfair, anything along those lines?

7 A. No.

8 Q. Okay. How about the other  
9 employees? You know, did anybody voice  
10 their reservations or concerns about being  
11 asked to donate?

12 A. I don't remember.

13 Q. Prior to that time, had you ever  
14 donated any money to any candidate?

15 A. No.

16 Q. Have you ever served in any  
17 elected capacity?

18 A. Can you rephrase that?

19 Q. Yeah, did you ever, like, run for  
20 office?

21 A. No.

22 Q. Have you ever served as a  
23 committee person?

24 A. Like election day?

25 Q. Yes.



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1 A. Yes.

2 Q. Well, not election day.

3 A. Okay.

4 Q. I guess there's committee people  
5 -- your attorney knows all about this, I  
6 don't. But there's ward leaders, committee  
7 people?

8 A. Oh. No.

9 Q. Okay. Do you know who your ward  
10 leader is?

11 A. Lou DiRenzo.

12 Q. Your next-door neighbor?

13 A. Yes.

14 Q. All right. Do you know any  
15 committee people that are in your  
16 neighborhood? By the way, does Mr.  
17 DiRenzo -- does he still work for the  
18 register of wills?

19 A. I'm not sure.

20 Q. Did he work when -- was he at the  
21 register of wills when Tracey Gordon took  
22 office?

23 A. Yes.

24 Q. Do you know if he stayed there  
25 or...

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1 A. I believe he did.

2 Q. Okay.

3 A. I'm just not sure if he's still  
4 working or not now. He's a little older.

5 Q. Okay. Is he still a ward leader?

6 A. I believe so.

7 Q. Has he ever asked you to donate  
8 to any campaigns?

9 A. No.

10 Q. Had you ever volunteered to work  
11 at a poll for any candidates or for any  
12 party?

13 A. For my neighbor, yes.

14 Q. For Mr. DiRenzo?

15 A. Yes, as a favor.

16 Q. Okay. He asked you hey, can you  
17 help out at the polls?

18 A. Yes.

19 Q. All right. Do you remember what  
20 election that was?

21 A. I do not.

22 Q. Did you just hand out literature?

23 A. Yes.

24 Q. And that was just that one time?

25 A. Yes.

Nicholas Barone  
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1 Q. All right. So you come back the  
2 next day after Mr. Campion asked you if you  
3 would donate for the luncheon. And what  
4 did he tell him?

5 A. I said that I would.

6 Q. What did he say in response?

7 A. I don't remember.

8 Q. All right. And was there any  
9 further communication about the luncheon,  
10 when it would be, where it would be,  
11 anything like that?

12 A. I don't remember.

13 Q. And how did you donate -- strike  
14 that.

15 Did you donate the money?

16 A. Yes.

17 Q. How did you donate it?

18 A. Cash, I believe.

19 Q. Who did you give the cash to?

20 A. I don't remember.

21 Q. Did you give the cash to somebody  
22 on the day of the luncheon or before?

23 A. Prior.

24 Q. And do you know how many people  
25 were at the luncheon?

1 A. I do not.

2 Q. Do you know if everybody donated  
3 who was at the luncheon?

4 A. I do not.

5 Q. Were any of your co-workers at  
6 the luncheon?

7 A. Yes. All five of us were there.

8 Q. Okay. Do you know if all five  
9 donated?

10 A. I don't remember.

11 Q. Did anybody talk about it? With  
12 your co-workers?

13 A. I don't remember.

14 Q. Nobody said I can't believe we  
15 gotta donate? Nothing? Nobody griped,  
16 complained?

17 A. Not that I recall.

18 Q. How about you? Did you gripe or  
19 complain or comment about the fact that you  
20 were being asked to donate to your boss'  
21 campaign?

22 A. To myself, I mean.

23 Q. Right. To anybody else?

24 A. No.

25 Q. How about to your family, did you

1 ever complain to them?

2 A. No.

3 Q. All right. So you donate the  
4 \$125 in cash, you go to the lunch. What  
5 did they serve? Lobster?

6 A. It was a --

7 Q. Filet mignon?

8 A. Chicken wing platter.

9 Q. Chicken wing platter. Did Ms.  
10 Gordon say anything at the luncheon?

11 A. No.

12 Q. Like, no "thanks everybody for  
13 being here and contributing," nothing like  
14 that?

15 A. I don't remember.

16 Q. Okay. How about anybody else on  
17 her behalf, did anybody say anything?

18 A. Not that I recall.

19 Q. And was this all -- were these  
20 all, like, employees of the register of  
21 wills, to your knowledge? Or were there  
22 outsiders that were there as well?

23 A. To my knowledge, it was  
24 employees.

25 Q. All right. Did you ever donate

1 to Ms. Gordon's campaign at any other time  
2 during your tenure of employment at the  
3 register of wills?

4 A. No.

5 Q. Were you ever asked to contribute  
6 at any other time?

7 A. Yes.

8 Q. All right. This fundraiser, by  
9 the way, was that the first time you were  
10 asked?

11 A. Yes.

12 Q. When was the next time that you  
13 were asked?

14 A. It was right before the end of  
15 the year. I'm not sure on the date.

16 Q. All right. So you were  
17 terminated in January of '22; is that  
18 correct?

19 A. Yes.

20 Q. So using that as a frame of  
21 reference, if she took office in 2020, and  
22 you were terminated in '22, do you  
23 remember, A, when that luncheon was? Does  
24 that help you?

25 A. The first one or the second?

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1 Q. The first one.

2 A. The first one, I believe -- it  
3 was in nice weather, that's all I can  
4 remember.

5 Q. So if it was --

6 A. Before summer, I would say.

7 Q. And probably not in the height of  
8 COVID in 2020?

9 A. No.

10 Q. All right. So it sounds like  
11 probably 2021?

12 A. 2021.

13 Q. Okay. And then this next time  
14 where you were asked to donate, that would  
15 have been in 2021 as well, near the end of  
16 the year?

17 A. Yes.

18 Q. Do you remember what month?

19 A. I do not.

20 Q. Who asked you?

21 A. At first, Tom Campion.

22 Q. And where was it when he asked  
23 you?

24 A. We were in the office in the  
25 archives.

1 Q. Was anyone else present?

2 A. He asked all the employees in the  
3 office.

4 Q. And who were the other employees  
5 that were there at the time?

6 A. Chris Guest and Mark Wilson.

7 Q. And what did Mr. Campion ask?  
8 What did he say?

9 A. He asked if we wanted to donate  
10 to her campaign.

11 Q. All right. Did he say anything  
12 else?

13 A. No.

14 Q. Did anybody respond?

15 A. I did.

16 Q. What did you say?

17 A. No.

18 Q. All right. Did anyone else  
19 respond?

20 A. They weren't happy about it.

21 Q. What did they say that made you  
22 believe that they were not happy?

23 A. I don't remember --

24 Q. All right.

25 A. -- specifically.



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1 Q. When you said no, did Mr. Campion  
2 say anything in response?

3 A. He said are you sure? I said  
4 yes.

5 Q. Was anything else said during  
6 that meeting?

7 A. Not that I remember.

8 Q. Did Mr. Campion say how much?

9 A. Yes. It was \$150.

10 Q. Okay. Was anything else  
11 discussed at that meeting that you haven't  
12 told me about?

13 A. Just the donating the money.

14 Q. Okay. But was anything else said  
15 about donating the money that you haven't  
16 told me about?

17 A. I just didn't want to do it. He  
18 said that we should do it. Because it's  
19 for her. And they were really, like,  
20 breaking his balls. I don't want to say  
21 that, I'm sorry.

22 Q. She's heard a lot worse than  
23 that. It's fine.

24 A. Okay.

25 MR. GONZALES: Off the

1 record.

2 (A discussion was held off  
3 the record.)

4 MR. GONZALES: Back on the  
5 record.)

6 BY MR. GONZALES:

7 Q. So we had a little discussion  
8 about, you know, vulgar language, and the  
9 appropriateness of using vulgar language in  
10 a deposition. And I encourage you, if  
11 vulgar language was used we need to hear  
12 it. You don't need to withhold that. You  
13 know, it's not that you're doing anything  
14 intentional.

15 A. Right.

16 Q. When I ask you was anything else  
17 said, I mean it. Tell me anything and  
18 everything that you remember, and the words  
19 that were actually used.

20 A. Okay. He asked us to donate the  
21 money.

22 Q. "He," meaning Champion?

23 A. Champion, yes.

24 Q. Go ahead.

25 A. Group census was no. I kind of

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1 lead the charge on the no because I was  
2 making the least amount of money in the  
3 office.

4 And he said that they were  
5 really breaking his balls. And I told him  
6 I don't -- I don't care. I make this  
7 amount of money every couple weeks, and I  
8 can't afford to donate again to, you know,  
9 whatever cause it is. So, we talked about  
10 it for, like, 20 minutes-ish. And then he  
11 was talking to the other employees.

12 I went back to work. I  
13 came back later that day, and he said that  
14 Keith Harris had called him, and they were  
15 really pushing for, you know, the donation.  
16 And I just told him that you can tell him I  
17 said no. Like, I'm not -- I don't want to  
18 give the money. So then the day ended.

19 Q. Okay. You said this discussion  
20 was about 20 minutes. Do you remember  
21 anything else that was said during that 20  
22 minutes?

23 A. I do not.

24 Q. And did anybody call in during  
25 that meeting, or was it just the folks that

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1 were in that room?

2 A. While we were talking?

3 Q. Yeah.

4 A. Not that I recall.

5 Q. Okay. All right. So later that  
6 day Campion told you that Harris called him  
7 and was really pushing for donations. Did  
8 he say anything else about what Harris said  
9 to him?

10 A. No.

11 Q. Did you say anything else to him  
12 other than what you said?

13 A. Did I say anything else?

14 Q. Back to Campion when he told you  
15 about Harris.

16 A. I just told him I'm not donating.

17 Q. Okay. And that was the end of  
18 that discussion?

19 A. Yes.

20 Q. All right. When was the next  
21 time anybody talked to you about donating?

22 A. They asked all week.

23 Q. When you say "they," who is they?

24 A. Keith Harris.

25 Q. He asked you directly?

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1 A. No. He would go through Tom.

2 Q. So Tom Campion would tell you  
3 that Keith Harris was asking for money?

4 A. Yes.

5 Q. That's what I want to find out.  
6 So the next day, tell me what happened.

7 A. I went to work, normal day, and  
8 then he asked again in the afternoon.

9 Q. Campion?

10 A. Yes.

11 Q. All right.

12 A. Said Keith has been calling him.  
13 And they even said that they would lower it  
14 to half of the money. And I still told him  
15 no.

16 Q. All right. And any other  
17 discussion the next day, other than what  
18 you just described?

19 A. It was a little longer because he  
20 was trying to -- he said it would be smart  
21 if we just did it, that way everything can  
22 be normal. But I just didn't want to  
23 donate the money. I wasn't obligated to  
24 donate it, you know.

25 Q. Okay. And then the next day, did

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1 it happen again?

2 A. Yes. He asked. I said no.

3 Q. "He," meaning Campion?

4 A. Campion. Said that Keith has  
5 been calling him all week. And he said  
6 that Keith told him, she said it could be  
7 half the money, it doesn't matter.

8 Q. All right. And what did you tell  
9 Campion?

10 A. I told him no. I said I'm not --  
11 Campion even offered to pay for me, and I  
12 told him no.

13 Q. Do you know whether he ever paid  
14 for you in the past?

15 A. Before this?

16 Q. Yes.

17 A. No.

18 Q. So, what was the next thing that  
19 happened with respect to the donation?

20 A. Nothing. The conversations just  
21 ended.

22 Q. Okay.

23 A. And then --

24 Q. So the --

25 A. Sorry.

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1 Q. No, I'm breaking my own rules  
2 here.

3 A. And that was -- that was it,  
4 pretty much.

5 Q. Other than Campion, did anyone  
6 else directly solicit or ask you for  
7 donations to Ms. Gordon's campaign?

8 A. No.

9 Q. So all of the requests came  
10 verbally through Tom Campion; is that  
11 correct?

12 A. Yes.

13 Q. And you believe this discussion  
14 that you just described occurred sometime  
15 in late 2021?

16 A. I believe so.

17 Q. Do you remember what month?

18 A. November.

19 Q. And other than this discussion  
20 that occurred in November of 2021, I take  
21 it there were no other requests to you to  
22 donate Ms. Gordon's campaign; is that  
23 correct?

24 A. After that week, no.

25 Q. Have you ever talked to Keith

1 Harris about this topic?

2 A. I haven't seen Keith Harris in  
3 years, so no.

4 Q. I understand, but --

5 A. Oh. No.

6 Q. -- did you ever talk to him?

7 A. I did not.

8 Q. Okay. All right. So tell me  
9 about your termination from the register of  
10 wills. How did you find out?

11 A. It was a Friday, a snow day, the  
12 city was closed. And I got a call from  
13 Charmaine Collins saying that she was told  
14 to go ahead and terminate me. I was  
15 shocked. I asked why. And she said that  
16 she was told not to ask, to just do it.  
17 And then I asked her when I could come  
18 clean my desk out.

19 Q. Did she say anything else to you?  
20 About why you were being terminated?

21 A. No. She just said, sorry, I have  
22 to terminate you.

23 Q. Did you ever talk to Emilio  
24 DiGregorio? Is that his name? Do you know  
25 him?



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1 A. I do.

2 Q. Have you ever spoken to him,  
3 personally?

4 A. About this?

5 Q. About anything.

6 A. Maybe if I would see him at City  
7 Hall, like a hello, how are you doing, type  
8 thing.

9 Q. Have you ever talked to him after  
10 your termination?

11 A. No.

12 Q. Did you ever have any  
13 conversations with him about being asked to  
14 donate?

15 A. No.

16 Q. Did he ever tell you why you were  
17 terminated?

18 A. No.

19 Q. All right. So, again, this  
20 telephone call from Charmaine Collins, have  
21 you told me everything that she said during  
22 that phone call?

23 A. Yes.

24 Q. How long was that phone call?

25 A. I don't remember.

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1 Q. Did she give you instructions on  
2 cleaning out your desk?

3 A. I asked her if it could be, you  
4 know, the next day. And, obviously, there  
5 was nobody there Saturday, so I asked her  
6 could it be Sunday. I wanted to do it  
7 before Monday. That way I don't -- you  
8 know, the walk of shame type thing. And we  
9 organized it so Tom could meet me because  
10 they shut my badge off. Tom could meet me  
11 that Sunday, I want to say in the  
12 afternoon, to get my things and be on my  
13 way.

14 Q. And you arranged that during that  
15 phone call with Charmaine?

16 A. Yes.

17 Q. Did you have any communications  
18 with Tom Campion that weekend before you  
19 came in on Sunday?

20 A. I just called him to let him know  
21 that I was there on Sunday.

22 Q. All right. But you didn't talk  
23 to him?

24 A. No.

25 Q. Let's put it this way -- you

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1 didn't talk to him the day that you got  
2 notified of your termination; is that  
3 correct?

4 A. No.

5 Q. Prior to that, had anyone  
6 indicated that there were any issues with  
7 your job performance?

8 A. No.

9 Q. Had anybody, to your knowledge,  
10 raised concerns about the overall  
11 performance of the archive unit?

12 A. No.

13 Q. Do you recall attending any  
14 meetings with folks that came in from City  
15 Hall to talk to the archives people about  
16 the archives unit, about the protocols down  
17 there, anything like that?

18 A. I believe there was one time  
19 where they came down, and we talked  
20 about -- it was during -- right -- during  
21 COVID about, like, how things were supposed  
22 to be done, et cetera. But I --

23 Q. That was it?

24 A. I'm not -- I don't remember most  
25 of that, though.

Nicholas Barone  
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1 Q. All right. You said you had a  
2 swipe card?

3 A. I did.

4 Q. That's how you would get in and  
5 out of the archives building?

6 A. Sometimes. It was -- the swiper  
7 thing was broken a lot, and the door was --  
8 it used to get broken sometimes because of  
9 looting and stuff like that. So you would  
10 have to call somebody to open the door  
11 sometimes. Not all the time, but...

12 Q. Okay. But generally, if you went  
13 to work, you would swipe, and that would  
14 let you in, and you would sign the sign-in  
15 sheet.

16 A. I would attempt to, yes.

17 Q. Right, I understand. And there  
18 were times when the swipe card didn't work.

19 A. Yes.

20 Q. All right. Were there times when  
21 it wasn't locked? Like you literally could  
22 just go in without swiping?

23 A. The door itself?

24 Q. Yes.

25 A. No.

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1 Q. Okay.

2 A. But there also was another  
3 entrance on the other side of the building,  
4 where a separate warehouse, their door was  
5 sometimes open as well.

6 Q. Okay. But generally, if your  
7 swipe card didn't work, you would just call  
8 another employee --

9 A. Yes.

10 Q. -- and they would let you in?

11 A. Yep.

12 Q. All right. On the Sunday you  
13 came in to pick up your stuff, did you call  
14 Mr. Campion to tell him you were there?

15 A. Yes.

16 Q. Was he already inside?

17 A. No. I believe he was just  
18 pulling up in his truck.

19 Q. So tell me about that. Did he  
20 say anything to you when he got there?

21 A. He just said sorry. He said --  
22 well, I mean, it's not his fault, so...  
23 But I got my things. We talked for, like,  
24 five minutes, just wished him luck and went  
25 on my way.

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1 Q. Did you have any -- when you  
2 talked to him, did you talk to him anything  
3 about Tracey Gordon?

4 A. No.

5 Q. Anything about donating to the  
6 campaign?

7 A. No.

8 Q. Did he tell you why you were  
9 being terminated?

10 A. He said he didn't know that I was  
11 even being let go.

12 Q. Did you ask him, like, what did I  
13 do, what happened? Anything like that?

14 A. I just asked if he knew. And he  
15 said no because he just wrote a...

16 Q. A performance review?

17 A. Yes.

18 Q. Which was a good performance  
19 review.

20 A. Which was -- yes.

21 Q. Okay.

22 A. So I guess I was surprised. And  
23 I assumed he would be the one to know at  
24 least, and he said he had no idea. And I  
25 believe him. He was a genuine guy.

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November 18, 2024

1 Q. Okay. And then you were able to  
2 go in and clean the stuff out of your desk?

3 A. Yes.

4 Q. Were you able to get all your  
5 personal belongings?

6 A. Yes. I only had, like, change in  
7 there. Everything else I just left.

8 Q. Okay. Did you leave your swipe  
9 card or anything?

10 A. Yeah, I believe I gave it to Tom.

11 Q. The cell phone, it was your --  
12 did you use your personal cell phone, or  
13 was it city-issued?

14 A. Personal cell phone.

15 Q. Did you at some point receive an  
16 actual termination letter?

17 A. Yes.

18 Q. How did you receive that?

19 A. I got an e-mail, and then I got a  
20 letter, I would say, a few weeks later.

21 Q. Who was the e-mail from?

22 A. Charmaine Collins.

23 Q. And what did it say, if you  
24 remember?

25 A. I don't remember.

Nicholas Barone  
November 18, 2024

1 Q. Did it say why you were being  
2 terminated?

3 A. No.

4 Q. When you got the e-mail, did you  
5 call anybody at the register of wills or at  
6 the city to get more information?

7 A. No.

8 Q. And then you said you got the  
9 letter in the mail?

10 A. I believe so.

11 Q. All right. And did the letter  
12 tell you why you were terminated?

13 A. I don't remember.

14 Q. After you got the letter, did you  
15 call anybody or contact anyone at the city  
16 to get more information?

17 A. No.

18 Q. Since you left the city, have you  
19 spoken to anyone at the city who has told  
20 you why you were terminated?

21 A. I was told by Pat Parkinson that  
22 I was let go because of the donation.

23 Q. When did he tell you that?

24 A. We had a phone call about June.  
25 You know, we talked. I just asked him how



1 he was. He asked the same, if I was  
2 working.

3 And I just -- I said, "It  
4 was the money, wasn't it?" He said, "Of  
5 course it was."

6 And that's all I remember  
7 from that conversation.

8 Q. He didn't say anything other than  
9 "Of course it was," in response to your  
10 question?

11 A. He told me that I should get an  
12 attorney.

13 Q. Did he recommend any attorneys?

14 A. He did.

15 Q. What attorneys did he recommend?

16 A. He recommended him, Dan.

17 Q. Mr. Savage?

18 A. Yes.

19 Q. All right. And I take it then,  
20 at that point or soon after, you did  
21 contact Mr. Savage?

22 A. I reached out, yes.

23 Q. Again, other than this  
24 conversation you had with Mr. Parkinson,  
25 did you speak with anyone else who either

1 worked or formerly worked at the register  
2 of wills who told you why you were  
3 terminated?

4 A. I seen Rasheen Crews on election  
5 day in May.

6 Q. May of this year?

7 A. No, before. Of that year, 20 --

8 Q. '22?

9 A. Yes.

10 Q. Where did you see him?

11 A. I was working the polls. And he  
12 came in, I believe, to say hello to Lou.  
13 And me and him were friendly, so I -- you  
14 know, said hello to him, asked him how he  
15 was. I asked him, I said, "Was it the  
16 money?" And he shook his head yes.

17 Q. Did he say anything else, other  
18 than shaking his head in response to your  
19 question?

20 A. No.

21 Q. Have you spoken to any other  
22 current or former employees at the register  
23 of wills who told you why you were  
24 terminated?

25 A. No.

1 Q. Has anyone else, other than your  
2 attorneys, spoken to anyone else who has  
3 told you why you were terminated?

4 A. No.

5 Q. So, tell me how you felt when you  
6 were notified that you were terminated.

7 A. That day?

8 Q. Yes.

9 A. I cried, actually.

10 Q. Why?

11 A. I was just surprised. I mean, I  
12 felt like I was stuck now. And it took a  
13 toll on me for sure. But, you know, I  
14 wasn't happy. I was shocked. I thought I  
15 just -- I thought I was actually going to  
16 get a raise because of the review, and I  
17 thought I deserved one. But the complete  
18 opposite happened.

19 Q. Did you ever apply for any  
20 reemployment with the city?

21 A. No.

22 Q. Any reason why not?

23 A. No.

24 Q. I mean, nobody told you that you  
25 couldn't reapply for another job in another

1 department within the city?

2 A. Like the water department or  
3 something?

4 Q. Anything.

5 A. No, I didn't.

6 Q. Did you talk to Mr. DiRenzo -- is  
7 that his --

8 A. Yes.

9 Q. Did you talk to Lou about any,  
10 you know, possible jobs --

11 A. No.

12 Q. -- elsewhere within the city?

13 A. Nothing.

14 Q. Did you ever talk to Lou about  
15 what happened to you?

16 A. No.

17 Q. Never?

18 A. Never.

19 Q. Did he ever ask?

20 A. No. When I see Lou, it's just  
21 hello, how are you, just neighbor --  
22 neighbor things, yeah, never...

23 Q. Have you ever talked to any, you  
24 know, like, political people about what  
25 happened to you?

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1 A. No.

2 Q. I mean, other than Pat. I mean,  
3 Pat's a...

4 A. I don't know anybody political --

5 Q. All right.

6 A. -- so no.

7 Q. You know your neighbor, right?

8 Well other than that. All right.

9 (Exhibit Barone-1 is marked for  
10 identification.)

11 BY MR. GONZALES:

12 Q. Mr. Barone, I'm putting a  
13 document in front of you. It is marked  
14 Barone-1.

15 It is a January 7, '22  
16 letter to you from Tracey Gordon, and it's  
17 Bates number Defense 14.

18 Do you see this?

19 A. Yes.

20 Q. Is this a copy of the letter that  
21 was sent to you regarding your termination?

22 A. Yes.

23 Q. Okay. At the bottom, it says if  
24 you have any questions regarding your  
25 separation, please contact Charmaine

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1 Collins. And it has an e-mail address.

2 Did you ever contact Ms.

3 Collins after that initial e-mail you

4 received from her?

5 A. I just e-mailed her and asked her

6 about my vacation or sick time.

7 Q. Okay. And what did she say in

8 response?

9 A. I don't recall.

10 Q. Did you get that back in pay?

11 A. Like eight, nine weeks after,

12 yes.

13 Q. Okay. Do you contend that they

14 shorted you in any way --

15 A. No.

16 Q. -- or that you were owed

17 something, other than obviously for being

18 terminated? But any back time, PTO, that

19 they owe you, to your knowledge?

20 A. I don't believe so.

21 Q. Did you apply for COBRA benefits?

22 A. I believe so.

23 Q. Did you get them?

24 A. I don't recall.

25 Q. Did you have health insurance

Nicholas Barone  
November 18, 2024

1 when you were working at Penn Auto?

2 A. After the four months, I did.

3 Q. So, when you first started there,

4 no...

5 A. Nothing.

6 Q. Got it. And then when you became

7 full-time --

8 A. Correct.

9 Q. -- you were eligible for

10 benefits, and then you got them?

11 A. Yes.

12 Q. Okay. Did you have any

13 out-of-pocket medical expenses in, let's

14 say, from January of '22 until whatever

15 that was, September, October?

16 A. No. I tried avoiding going to

17 the doctor.

18 Q. Right. Was there any medical

19 condition that worsened because you didn't

20 go to the doctor during that time frame?

21 A. No. Also, sorry I keep doing the

22 interruption thing. I don't mean it.

23 Q. That's all right. Don't worry

24 about it.

25 A. I will try to let you finish the

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1 questions.

2 (Exhibit Barone-2 is marked for  
3 identification.)

4 BY MR. GONZALES:

5 Q. Mr. Barone, I'm showing you a  
6 document which we have marked as Barone-2,  
7 which is marked Defense 18.

8 This is a memo to archives  
9 staff from Tom Campion from April of 2021  
10 regarding full schedule effective 8 April  
11 2021.

12 Do you see that?

13 A. Yes.

14 Q. Just looking at this, at the  
15 beginning it says, "Please let this memo  
16 serve as formal notice of our return to a  
17 full onsite operating schedule."

18 It would be fair to say  
19 that sometime in April of 2021 you guys  
20 were back, sort of full-time, in the  
21 office?

22 A. Yes.

23 Q. And so there wasn't any more of  
24 the two people on, two people off?

25 A. No, it was -- yeah, we were full



1 force at that point.

2 Q. Okay. Do you know -- and that's  
3 your signature on here, correct?

4 A. Yes.

5 Q. Again, but it's your testimony  
6 that you don't recall any discussions from  
7 anyone about concerns about archive staff  
8 showing up for work or --

9 A. Correct.

10 Q. -- doing the job in a timely  
11 manner?

12 A. Correct.

13 Q. Okay.

14 MR. GONZALES: Let me look  
15 at my notes. I think we might be done.

16 (A brief recess was  
17 taken.)

18 MR. GONZALES: Back to the  
19 record.

20 BY MR. GONZALES:

21 Q. Other than that one fundraiser  
22 for Ms. Gordon, have you ever attended a  
23 political fundraiser for any other  
24 candidates or parties?

25 A. No.

1 Q. And again, other than the  
2 conversations that you had with Mr.  
3 Campion, did any other individual ever  
4 request or ask you to donate to Ms.  
5 Gordon's campaign?

6 A. No.

7 MR. GONZALES: That is all  
8 the questions I have for you.

9 MR. SAVAGE: I just have a  
10 couple questions, if it's okay.

11 EXAMINATION

12 BY MR. SAVAGE:

13 Q. When you started part-time at the  
14 register of wills, you didn't receive any  
15 benefits --

16 A. No.

17 Q. -- you didn't receive any  
18 vacation time or sick time, correct?

19 A. Correct.

20 Q. Okay. When you went with Penn  
21 Auto, you testified that you went full-time  
22 in October of 2022?

23 A. Yes, middle October.

24 Q. But your benefits didn't come  
25 into fruition until January of 2023,

1 correct?

2 A. Correct.

3 Q. Okay. And then if overtime was  
4 available to you at Penn Auto, you chose  
5 not to take that because your father --  
6 grandfather lived around the corner from  
7 you, correct?

8 A. Correct.

9 Q. And you looked after him?

10 A. Yes.

11 Q. All right. Tom Campion, when he  
12 asked you to donate money, did he tell you  
13 that Keith Harris called?

14 A. Yes.

15 Q. Did you ever see him on the phone  
16 with him?

17 A. He would walk out of the office.

18 Q. Okay. And also, you testified  
19 that you cried when you found out that you  
20 were being terminated, and for six months  
21 you tried to get a job. Did you experience  
22 a lot of sleeplessness and anxiety?

23 A. Yes, my anxiety went through the  
24 roof because I had no income. And then I  
25 burned through everything I had for bills

1 and everything. And it was a very  
2 stressful point in my life, for sure.

3 Q. And then you -- you testified  
4 that you gave flyers out for the campaign  
5 at a polling place one time?

6 A. Yes.

7 Q. Yes. But you also work as a --  
8 when you saw Rasheen Crews?

9 A. I was working as a --

10 Q. Election board member?

11 A. Yes.

12 Q. Nonpartisan position?

13 A. Yes.

14 Q. And the lunch fundraiser that you  
15 testified to, I guess we all came to the  
16 conclusion that it happened in the spring  
17 of 2021, correct?

18 A. Correct.

19 Q. And the reason you didn't reapply  
20 to the City of Philadelphia is because you  
21 were terminated from the City of  
22 Philadelphia?

23 A. Yes, I didn't think I could.

24 Q. All right.

25 MR. GONZALES: Just one

1 follow-up.

2 EXAMINATION

3 BY MR. GONZALES:

4 Q. When you were living -- strike  
5 that.

6 Your parents, do they  
7 charge you rent?

8 A. They did. But --

9 Q. They don't now?

10 A. No, I do a lot for my parents,  
11 yes.

12 Q. Okay. When did they charge you  
13 rent? For what years?

14 A. Once I came home from IUP.

15 Q. All right. And how much do they  
16 charge you?

17 A. I don't recall.

18 Q. I take it there's no receipts or  
19 anything for what you were paying?

20 A. No.

21 Q. And you said you had a car?

22 A. I did.

23 Q. Okay. And what happened to the  
24 car?

25 A. Well, now I don't have it

Nicholas Barone  
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1 anymore.

2 Q. Right. What happened?

3 A. It was a 20-year-old car --

4 Q. Okay.

5 A. -- that I bought for, like, six  
6 hundred bucks. Yeah.

7 Q. All right. So you ride to work  
8 with what, your mom or your brother?

9 A. No, I have my own vehicle now.

10 Q. Okay.

11 MR. GONZALES: That is it.

12 Thank you.

13 (The deposition was concluded at  
14 11:26 a.m.)

15 - - -

16 THE REPORTER: Can I get  
17 your transcript orders, please?

18 MR. SAVAGE: Full, mini,  
19 and text.

20 THE REPORTER: Normal  
21 turnaround?

22 MR. GONZALES: Yes, that's  
23 fine.

24 - - -

25

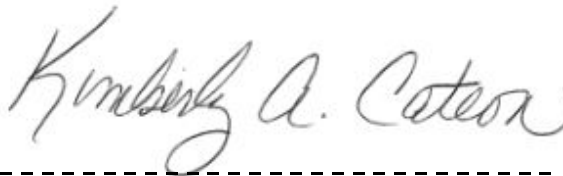
Nicholas Barone  
November 18, 2024

C E R T I F I C A T I O N

UNITED STATES DISTRICT COURT :

EASTERN DISTRICT OF PENNSYLVANIA :

I, Kimberly Cateon, a Professional  
Shorthand Court Reporter and Notary Public,  
do hereby certify the foregoing to be a true  
and accurate transcript of my original  
stenographic notes taken at the time and  
place hereinbefore set forth.



-----  
Kimberly Cateon,  
Professional Shorthand  
Court Reporter

(The foregoing certification of this  
transcript does not apply to any  
reproduction of the same by any names,  
unless under the direct control and/or  
supervision of the certifying reporter.)

## INSTRUCTIONS TO WITNESS

Read your deposition over carefully.

It is your right to read your deposition and make changes in form or substance. You should assign a reason in the appropriate column on the errata sheet for any change made.

After making any change in form or substance, and which have been noted on the following errata sheet, along with the reason for any change, sign your name on the errata sheet and date it. Then sign your deposition at the end of your testimony in the space provided. You are signing it subject to the changes you have made in the errata sheet, which will be attached to the deposition before filing. You must sign it in front of a witness. Have the witness sign in the space provided. The witness need not be a notary public. Any competent adult may witness your signature.

Return the original errata sheet to the court reporter promptly: Court rules require filing within 30 days after you receive the deposition.



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Nicholas Barone  
November 18, 2024

SIGNATURE PAGE

OF

NICHOLAS BARONE

I HEREBY ACKNOWLEDGE THAT I HAVE  
READ THE AFOREGOING DEPOSITION, DATED  
NOVEMBER 18, 2024, AND THAT THE SAME IS A  
TRUE AND CORRECT TRANSCRIPTION OF THE  
ANSWERS GIVEN BY ME TO THE QUESTIONS  
PROPOUNDED, EXCEPT FOR THE CHANGES, IF ANY,  
NOTED ON THE ATTACHED ERRATA SHEET.

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WITNESSED BY: \_\_\_\_\_

DATE: \_\_\_\_\_